

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**(1) FORTY-TWO THOUSAND, SIX  
HUNDRED FIFTY DOLLARS IN  
UNITED STATES CURRENCY  
(\$42,650.00),**

**(2) FOUR THOUSAND, NINE  
HUNDRED SIXTY DOLLARS IN  
UNITED STATES CURRENCY  
(\$4,960.00),**

**(3) ONE 2017 CADILLAC ESCALADE,  
VIN: 1GYS4JKJ1HR134879, WITH ALL  
ATTACHMENTS THEREON,**

**(4) ONE 2015 DODGE CHALLENGER,  
VIN: 2C3CDZFJ1FH733382, WITH ALL  
ATTACHMENTS THEREON,**

**(5) ONE 2008 DODGE CHARGER,  
VIN: 2B3KA73W78H104802, WITH ALL  
ATTACHMENTS THEREON,**

**and**

**(6) ONE PAIR OF CARTIER  
SUNGLASSES,**

**Defendants.**

**Case No. 3:20-CV-105**

**VERIFIED COMPLAINT FOR  
FORFEITURE IN REM**

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Plaintiff, United States of America, by its undersigned counsel, alleges the following for its action against the defendants in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

### **NATURE OF THE ACTION**

1. This is a civil action *in rem* brought to enforce 21 U.S.C. § 881(a)(4), which provides for the forfeiture to the United States of:

All conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property described in paragraph (1), (2), or (9);

and/or 21 U.S.C. § 881(a)(6), which provides for the forfeiture to the United States of:

All moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.

### **THE DEFENDANTS IN REM**

2. Defendant 1 is Forty-Two Thousand Six Hundred Fifty and 00/100 Dollars (\$42,650.00) in United States Currency. On or about September 26, 2019, the Drug Enforcement Administration (“DEA”) seized Defendant 1 from the residence of Bryan Barney, located at 4140 Rundell Drive, Dayton, Ohio, pursuant to a federal search warrant. The United States has deposited Defendant 1 into the Seized Asset Deposit Fund, where it will remain during the pendency of this action.

3. Defendant 2 is Four Thousand Nine Hundred Sixty and 00/100 Dollars (\$4,960.00) in United States Currency. On or about September 26, 2019, the DEA seized Defendant 2 from a vehicle (Defendant 3) parked in the driveway of Bryan Barney at 4140 Rundell Drive, Dayton, Ohio, pursuant to a federal search warrant. The United States has deposited Defendant 2 into the Seized Asset Deposit Fund, where it will remain during the pendency of this action.

4. Defendant 3 is a 2017 Cadillac Escalade, VIN: 1GYS4JKJ1HR134879, with all attachments thereon. On or about September 26, 2019, the DEA seized Defendant 3 at the

residence of Bryan Barney, located at 4140 Rundell Drive, Dayton, Ohio, pursuant to a federal search warrant. The DEA transferred custody of Defendant 3 to a property custodian of the United States Marshals Service (“USMS”), where it will remain during the pendency of this action.

5. Defendant 4 is a 2015 Dodge Challenger, VIN: 2C3CDZFJ1FH733382, with all attachments thereon. On or about September 26, 2019, the DEA seized Defendant 4 at an apartment, located at 21 Valleyview Drive, Dayton, Ohio, pursuant to a federal search warrant. The DEA transferred custody of Defendant 4 to a property custodian of the USMS, where it will remain during the pendency of this action.

6. Defendant 5 is a 2008 Dodge Charger, VIN: 2B3KA73W78H104802, with all attachments thereon. On or about September 26, 2019, the DEA seized Defendant 5 from Quentin Robinson in the parking lot at the Best Western Plus Hotel, located at 8099 Old Yankee Street, Dayton, Ohio. The DEA transferred custody of Defendant 5 to a property custodian of the USMS, where it will remain during the pendency of this action.

7. Defendant 6 is a pair of Cartier sunglasses. On or about September 26, 2019, the DEA seized Defendant 6 from the residence of Crawford Bogle, located at 22 East Siebenthaler Avenue, Dayton, Ohio, pursuant to a federal search warrant. The DEA transferred custody of Defendant 6 to a property custodian of the USMS, where it will remain during the pendency of this action.

### **JURISDICTION AND VENUE**

8. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendants under 21 U.S.C. § 881(a)(4) and/or (6). This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

9. This Court has *in rem* jurisdiction over the defendants under 28 U.S.C. § 1355(b)(1)(A) because acts and omissions giving rise to the forfeiture occurred in the Southern District of Ohio.

10. Venue is proper in this district under 28 U.S.C. § 1355(b)(1)(A) because acts and omissions giving rise to the forfeiture occurred in the Southern District of Ohio and under 28 U.S.C. § 1395 because the defendants were found in the Southern District of Ohio.

### **BASIS FOR FORFEITURE**

11. The defendants are subject to forfeiture under 21 U.S.C. § 881(a)(6) because they represent property furnished or intended to be furnished in exchange for a controlled substance, represent proceeds traceable to such an exchange, or were used or intended to be used to facilitate any violation of 21 U.S.C. § 841 or a conspiracy to commit such offense, in violation of 21 U.S.C. § 846.

12. Defendants 3, 4, and 5 are subject to forfeiture under 21 U.S.C. § 881(a)(4) because they were used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property described in 21 U.S.C. § 881(a)(1).

### **FACTS**

13. Beginning in or around late 2018, the DEA developed information identifying a large-scale drug trafficking organization (“DTO”) operating in Dayton, Ohio. The investigation has identified Crawford Bogle as the center of the DTO. Members of the DTO include, among others, Bryan Barney, Donte Williams, Quentin Robinson, and Savon Pope. The investigation has revealed that the DTO has distributed bulk amounts of methamphetamine, fentanyl, heroin, and cocaine throughout the Miami Valley. In doing so, the DTO used at least fourteen different



locations for processing drugs, storing drugs, concealing drug proceeds, and/or facilitating the sale of drugs.

14. Crawford Bogle (“Bogle”) has a history of controlled substance violations, and while he was in prison, his nephew, Savon Pope, continued the operations of the DTO.

15. As background, in January 2019, DEA agents intercepted a money parcel at a FedEx facility in Dayton, Ohio, which agents connected to Bogle. Upon the execution of a search warrant for the package, the DEA discovered \$25,000.00 in United States currency.

16. On or about April 23, 2019, DEA agents established surveillance at a Shell gas station in Vandalia, Ohio. Agents saw Bogle arrive at the station in a truck and park at a pump. Agents then observed Bogle exit the truck carrying a bag, which he placed in a trash can. DEA agents retrieved Bogle’s bag and discovered approximately \$32,070.00 in banded United States currency, which is consistent with drug trafficking.

17. Two days later, agents participated in a second money pick-up, this time with Savon Pope (“Pope”) and Quentin Robinson (“Robinson”). During a recorded telephone conversation, Pope indicated that he intended to deliver between \$80,000.00 and \$100,000.00 in United States currency. Pope advised that he would send his cousin, Robinson, to deliver the drug proceeds. Consistent with Pope’s representations, Robison delivered a shoebox containing approximately \$79,920.00 in United States currency to an undercover agent who was posing as a drug money courier.

18. On or about May 19, 2019, DEA agents witnessed Pope exit a known stash house carrying a weighted bag that he gave to Bryan Barney (“Barney”) who was parked in his vehicle outside the residence. Law enforcement followed Barney as he left the residence and attempted to make a traffic stop, but Barney fled from the officers at a high rate of speed. Based on their

training and experience, DEA agents believe that Barney fled to avoid the discovery of illegal drugs or drug proceeds in the bag.

19. During late July 2019, the United States District Court for the Southern District of Ohio entered an order authorizing the interception of wire and electronic communications to and from Bogle's telephone. The intercepted communications confirmed that Bogle, Pope, and associates such as Robinson, Donte Williams ("Williams"), and Barney engaged in almost daily patterns of significant drug trafficking activity.

20. During late August 2019, Williams participated in a monitored conversation with Bogle. During this call, Williams, who sells drugs on behalf of Bogle, explained that he was earning thousands of dollars from selling drugs to "jays" (a slang term for drug users) at a drug house in east Dayton. Law enforcement later observed foot traffic consistent with drug addicts entering the east Dayton location to acquire drugs and then promptly leaving the area. On one occasion, law enforcement observed two people going to and then departing from the residence. Ohio State Patrol conducted a traffic stop of the duo a short time after they left the location. During the stop, law enforcement recovered 9 grams of fentanyl. The duo confirmed that they had purchased the drugs from the east Dayton location.

21. In July and August 2019, a confidential source made controlled purchases from Barney. On both occasions, Barney sold suspected fentanyl to a confidential source.

22. On September 12, 2019, a federal grand jury in the Southern District of Ohio returned an indictment (Case No. 3:19-cr-137-WHR ), charging Crawford Bogle, Savon Pope, Bryan Barney, Donte Williams, Quentin Robinson, and others with various controlled substance violations.

23. On September 26, 2019, the DEA, assisted by numerous state and local law

enforcement agencies, executed seventeen federal search warrants and nineteen arrest warrants for places and people associated with Bogle's DTO.

24. While executing the search and arrest warrants at Bryan Barney's residence, located at 4140 Rundell Drive, Dayton, agents recovered approximately 32 grams of marijuana on the kitchen counter. From a shoebox located in the hallway near the front door, agents seized approximately 66 grams of fentanyl. In an empty children's bedroom, inside a child's backpack hanging on the closet door, agents located Defendant 1 (\$42,650.00 in United States currency). Barney's vehicle, Defendant 3 (2017 Cadillac Escalade, VIN: 1GYS4JKJ1HR134879), was parked in the driveway. Inside Defendant 3, agents located approximately 60 grams of fentanyl and Defendant 2 (\$4,960.00 in United States currency) inside the center console.

25. Barney's criminal history includes, among other offenses, charges for drug paraphernalia and felony possession of drugs. Barney is the owner of Luxury Motors of Ohio LLC, a car dealership, which agents believe is laundering money on behalf of the DTO.

26. The DEA seized Defendant 4 (2015 Dodge Challenger, VIN: 2C3CDZFJ1FH733382) at an apartment and known "stash house," located at 21 Valleyview Drive, Dayton, Ohio, pursuant to a federal search warrant. Agents seized from the location approximately 900 grams of methamphetamine, 140 grams of cocaine, 54 grams of crack cocaine, 753 grams of fentanyl, 97 grams of crystal methamphetamine, loaded firearms, and ammunition.

27. Throughout the investigation, agents observed Donte Williams driving Defendant 4 to and from 21 Valleyview Drive and recovered miscellaneous paperwork in his name in the vehicle. Williams has minimal or no legitimate employment. Defendant 4 is titled in the name of Kisie Lee, who is believed to be a straw purchaser. Agents recovered the key to Defendant 4 at 5444 Payne Avenue, Dayton, Ohio, where they arrested Williams, but Kisie Lee was not present



at the scene.

28. The DEA seized Defendant 5 (2008 Dodge Charger, VIN: 2B3KA73W78H104802) from Quentin Robinson in the parking lot at the Best Western Plus Hotel, located at 8099 Old Yankee Street, Dayton, Ohio. Robinson and Pope had rented rooms at the hotel. Upon Robinson's arrest, agents found the key to Defendant 5 on his person and \$3,856.00 in United States currency.

29. Defendant 5 is titled in the name of Raquel Robin, who is believed to be a straw purchaser. Agents recovered paperwork in the name of Raquel Robin in Defendant 5. Agents also recovered another current but temporary registration for Defendant 5 in the name of Ni Angel Faircloth. Robin and Faircloth were not present at the scene.

30. Robinson's criminal history includes, among other offenses, charges for aiding and abetting the distribution of heroin, aiding and abetting the distribution of a substance containing a detectable amount of heroin, two counts of felony illegal conveyance of weapons, possession of marijuana, and two counts of felony trafficking in drugs. Robinson has minimal or no legitimate employment.

31. The DEA seized Defendant 6 from the residence of Crawford Bogle, located at 22 East Siebenthaler Avenue, Dayton, Ohio, pursuant to a federal search warrant. Inside the residence, agents recovered a small bag of marijuana. Agents also seized Defendant 6 (a pair of Cartier sunglasses) from the nightstand in the master bedroom. During the investigation, agents intercepted calls regarding a pair of Cartier Sunglasses that Bogle had purchased and added diamonds to the frame.

32. Bogle's criminal history includes, among other things, felony marijuana conspiracy-possession with intent to distribute, felony possess with intent to distribute and



distribute 100 kilograms or more of marijuana and cocaine, six counts felony possession of drugs, felony permitting drug abuse, and drug paraphernalia. Bogle has minimal or no legitimate income.

33. On December 20, 2019, the DEA received a claim from Luxury Motors of Ohio, LLC and Bryan Barney, through their attorney, asserting an interest in Defendant 1 (\$42,650.00 in United currency), Defendant 2 (\$4,960.00 in United States currency), and Defendant 3 (2017 Cadillac Escalade, VIN: 1GYS4JKJ1HR134879).

34. On December 24, 2019, the DEA received a claim from Kisie Lee, through her attorney, asserting an interest in Defendant 4 (2015 Dodge Challenger, VIN: 2C3CDZFJ1FH733382).

35. On December 18, 2019, the DEA received a claim from Raquel Robin, asserting an interest in Defendant 5 (2008 Dodge Charger, VIN: 2B3KA73W78H104802).

36. On January 6, 2020, the DEA received a claim from Crawford Bogle, asserting an interest in Defendant 6 (a pair of Cartier sunglasses).

37. Based on the foregoing facts, the defendants are subject to forfeiture under 21 U.S.C. § 881(a)(6) because they represent property furnished or intended to be furnished in exchange for a controlled substance, represent proceeds traceable to such an exchange, or were used or intended to be used to facilitate any violation of 21 U.S.C. § 841 or a conspiracy to commit such offense, in violation of 21 U.S.C. § 846. Further, Defendants 3, 4, and 5 are subject to forfeiture under 21 U.S.C. § 881(a)(4) because they were used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property described in 21 U.S.C. § 881(a)(1).

**CLAIM FOR RELIEF**

WHEREFORE, the plaintiff respectfully requests that:

- (a) the Court find there is probable cause to believe that the defendants have been forfeited to the United States pursuant to 21 U.S.C. § 881(a)(4) and/or (6);
- (b) pursuant to Rule G(3)(b)(i), Supplemental Rules, the Court issue a warrant of arrest *in rem*, directing the United States to arrest and seize the defendants and to retain the same in its custody subject to further order of the Court;
- (c) the Court, pursuant to Rule G(4), Supplemental Rules, direct the United States to give notice to all persons and entities having an interest in the defendants to assert in conformity with the law a statement of any interest they may have, including notice by publication on the official government website, [www.forfeiture.gov](http://www.forfeiture.gov), for thirty consecutive days;
- (d) the forfeiture of the defendants to the United States be confirmed, enforced, and ordered by the Court;
- (e) the Court thereafter order the United States to dispose of the defendants as provided by law; and
- (f) the Court award the United States all other relief to which it is entitled, including the costs of this action.

Respectfully submitted,

DAVID M. DEVILLERS  
United States Attorney

s/Deborah D. Grimes  
DEBORAH D. GRIMES (0078698)  
Assistant United States Attorney  
221 East Fourth Street, Suite 400  
Cincinnati, Ohio 45202  
(513) 684-3711 / Fax (513) 684-6385  
[Deborah.Grimes@usdoj.gov](mailto:Deborah.Grimes@usdoj.gov)

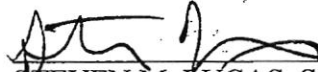
**VERIFICATION**

I, Steven M. Lucas, hereby verify and declare under the penalty of perjury that I am a Special Agent of Drug Enforcement Administration, that I have read the foregoing Verified Complaint for Forfeiture and know the contents thereof, and that the matters contained in the complaint are true to my own knowledge, except those matters stated to be alleged on information and belief and as to those matters, I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, and my investigation of this case.

I hereby verify and declare under the penalty of perjury that the foregoing is true and correct.

3/17/ 2020  
Date

  
STEVEN M. LUCAS, Special Agent  
Drug Enforcement Administration



JS 44 (Rev. 09/19)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff Montgomery  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Deborah D. Grimes, Assistant United States Attorney  
221 E. Fourth Street, Suite 400  
Cincinnati, OH 45202 (513) 684-3711

**DEFENDANTS**

Forty-Two Thousand, Six Hundred Fifty Dollars in United States  
Currency (\$42,650.00), et al.

County of Residence of First Listed Defendant Montgomery  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
Forfeiture pursuant to 21 U.S.C. § 881(a)(4) & (6)

Brief description of cause:  
Forfeiture

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE Walter H. RiceDOCKET NUMBER 3:19-cr-137DATE  
03/17/2020SIGNATURE OF ATTORNEY OF RECORD  
s/ Deborah D. Grimes

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_



AO 440 (Rev. 06/12) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff(s)*

v.

\_\_\_\_\_  
*Defendant(s)*

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Civil Action No. \_\_\_\_\_

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff(s)*

v.

\_\_\_\_\_  
*Defendant(s)*

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Civil Action No. \_\_\_\_\_

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:



AO 440 (Rev. 06/12) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff(s)*

v.

\_\_\_\_\_  
*Defendant(s)*

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Civil Action No. \_\_\_\_\_

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff(s)*

v.

\_\_\_\_\_  
*Defendant(s)*

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Civil Action No. \_\_\_\_\_

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:



AO 440 (Rev. 06/12) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff(s)*

v.

\_\_\_\_\_  
*Defendant(s)*

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Civil Action No. \_\_\_\_\_

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: